

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION

MARY HOLMES, DENISE DAVIS,  
ANDREW DALLAS, and EMPOWER  
MISSOURI,

Plaintiffs,

*-against-*

JESSICA BAX, in her official capacity as  
Acting Director of the Missouri Department of  
Social Services,<sup>1</sup>

Defendant.

Case No. 2:22-cv-04026-MDH

**JOINT MOTION TO  
EXTEND STAY**

On August 29, 2024, the parties jointly asked this Court to issue a three-month stay of this action and to refer the parties to mediation. ECF 185. On that day, the Court granted the motion, entered the stay, referred the parties to Magistrate Judge Epps for mediation, and ordered the parties to file a joint report within three months regarding the status of mediation. ECF 186. On November 26, the parties filed the joint report and requested a two-month extension of the stay. ECF 198. This Court granted the request, extending the stay until Friday, January 24, 2025.

The parties now seek an additional one-month stay of this action, and in support thereof provide the following:

1. Since the filing of their joint status report, the parties attended virtual mediation sessions with Magistrate Judge Epps on December 17, 2024 and January 21, 2025. Judge Epps has scheduled a final in-person mediation session for Tuesday, February 25, 2025 at 9:30 a.m.

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<sup>1</sup> Ms. Bax has been the Department's acting director since January 13, 2025, pending senate confirmation of her appointment. The parties submit this notice of substitution pursuant to Fed. R. Civ. P. 25(d).

2. The parties also met independently on December 2, 10, and 18, 2024; and January 8 and 15, 2025.
3. The parties have now reduced their proposals to writing, and believe they are very close to reaching a mutually agreeable resolution on relief in this action.
4. The parties plan to meet again on January 27, 2025.
5. The parties believe that with a one-month extension of the present stay, they will be able to develop a proposed order for relief that would fully resolve the pending claims in this litigation.

In light of the foregoing, the parties respectfully request the Court to extend the present stay until Friday, February 28, 2025.

Respectfully submitted,

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